

Mester & Schwartz, P.C  
Jason Brett Schwartz, Esquire  
1333 Race Street  
Philadelphia, PA 19107  
(267) 909-9036

IN THE MATTER OF	UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Debtor(s)  Peter David and <b>Dawn Marie Stern</b>	JUDGE: Kathryn C. Ferguson CASE NO.: 11-29912-RG CHAPTER 13 HEARING DATE: March 28, 2017
	NOTICE OF MOTION FOR ORDER DIRECTING PAYMENT OF FUNDS TO CLEARSPRING LOAN SERVICES, INC. PURSUANT TO 11 U.S.C. SECTION 347 AND 28 U.S.C. SECTION 2041 <i>ET. SEQ.</i>

TO: ALL PARTIES ON THE ANNEXED SERVICE LIST

PLEASE TAKE NOTICE THAT THE UNDERSIGNED WILL APPLY BEFORE

Honorable: Kathryn C. Ferguson

Date: March 28, 2017

Time: 10:00 a.m.

Place: United States Bankruptcy Court, District of New Jersey, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, NJ 08608

RELIEF SOUGHT: ORDER DIRECTING PAYMENT OF FUNDS TO CLEARSPRING LOAN SERVICES, INC. PURSUANT TO 11 U.S.C. section 347 AND 28 U.S.C. section 2041 *et. seq.* and D.N.J. LBR 9013-1 and other such relief as the Court may deem appropriate.

GROUND: See annexed certification.

STATEMENT RE BRIEF: Due to the uncomplicated legal issues and the Certification of here relevant facts, a brief is not necessary.

**PLEASE TAKE NOTICE** that Jason Brett Schwartz as counsel for Dilks & Knopik, LLC attorney in fact to ClearSpring Loan Services, Inc., a creditor in the above-captioned proceeding (the "Claimant"), shall move for an Order Directing Payment of Funds to Creditor Claimant,

Pursuant to 11 U.S.C. §347 and 28 U.S.C. §204 1, et. seq. (the "Motion"). The funds are in the Court Clerk's registry for unclaimed funds. The undersigned moves as required by Local Bankruptcy Rule D.N.J. LBR 3011-1.

**PLEASE TAKE FURTHER NOTICE**, that in support of the Motion, the Claimant shall rely upon the certification and proposed form of Order submitted herewith.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to D.N.J. LBR 9013-1 of the Local Rules of this Court, objections, if any, to the Motion and proposed Order must be in writing, must conform to the requirements of the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the District of New Jersey, set forth the name of the objector, the basis for the objection and the specific grounds therefore, and must be filed with the Clerk of the Court and served upon the undersigned at least seven (7) days prior to the hearing date indicated herein with copies filed simultaneously served upon the attorney whose name and address appear below.

**PLEASE TAKE FURTHER NOTICE**, pursuant to D.N.J. LBR 9013-1 of Local Rules of this Court, failure of any person or entity receiving notice of the Motion to file objections thereto on a timely basis shall be a bar to the assertion of an objection to the entry by the Court of the proposed Order, as same may be modified, and the within Motion shall be deemed uncontested.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to D.N.J. LBR 9013-1(f) of the Local Rules of this Court, the undersigned hereby requests oral argument only if the within Motion is opposed.

Dated: February 23, 2017

/s/ Jason Brett Schwartz

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